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The Honorable Valerie Caproni
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

MEMO ENDORSED

Re: *Paulino v. Sony Music Entertainment, et al.*, Case No. 1:24-cv-01506-VEC

Dear Judge Caproni:

We represent Defendants Sony Music Entertainment, Ron Perry, Jenny Schechter, and Alexa Abrams (“Defendants”) in connection with the above-referenced matter and write jointly with Plaintiff’s counsel in advance of the scheduled October 25 court conference, as requested by your Honor’s June 14 Order. Defendants’ Motion to Dismiss is currently pending.

The Parties write seeking a 60-day extension to the current October 25 discovery deadline and upcoming court conference. While the Parties are cooperating and actively conducting discovery, certain ESI gathering and review is taking longer than anticipated and will not be completed by the scheduled deadline. Additionally, the Parties have begun settlement discussions and the requested extension will allow for the necessary time for those discussions to continue.

Given the preceding extension request, the Parties are not able at this time to state their positions on the anticipated length of trial, whether the case is to be tried to a jury, or whether either party anticipates filing a motion for summary judgment or a motion to exclude expert testimony.

Respectfully submitted,

/s/ Jacob P. Tucker

Jacob P. Tucker

cc: All Counsel (via ECF)

Application GRANTED. The deadline for the completion of all document discovery is extended from October 25, 2024, to **December 20, 2024**. The pretrial conference scheduled for October 25, 2024, at 10:00 A.M. is ADJOURNED to **December 20, 2024, at 10:00 A.M.** The parties are directed to submit a joint letter in accordance with the Court's Order at Dkt. 34 by not later than **December 12, 2024**.

SO ORDERED.

A handwritten signature in blue ink, appearing to read "Valerie Caproni", is written over a horizontal line.

10/18/24

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE